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Attorneys for Plaintiff
BIOGEN IDEC MA INC.

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

BIOGEN IDEC MA INC.,

Plaintiff,

v.

LLOYD TRAN and NEUROBIOGEN, LLC,

Defendants.

Case No. C 15-0743 CRB

**STIPULATED MOTION FOR
CONTINUANCE AND ORDER**

1 This Unopposed Motion and Proposed Order (“Motion”) is made by Plaintiff Biogen Idec
2 MA Inc. (“Biogen”).

3 Pursuant to Local Civ. R. 6-3, Biogen requests as follows:

4 1. The Case Management Conference is presently set for May 22, 2015 at 8:30 a.m.

5 2. The parties have reached an agreement in principle to resolve the dispute.

6 3. Defendant Tran is an individual proceeding *pro se* in this matter. Defendant
7 Neurobiogen is an unrepresented corporate entity incapable of proceeding *pro se*.

8 4. Pursuant to the parties’ agreement, earlier today, Biogen and Defendant Tran filed a
9 stipulation and [Proposed] Final Judgment Upon Consent and Permanent Injunction, disposing of all
10 issues as against Defendant Tran.

11 5. Further, upon the Court’s execution of the [Proposed] Final Judgment Upon Consent
12 and Permanent Injunction, Biogen will file a dismissal without prejudice as against Defendant
13 Neurobiogen, thereby disposing of all parties and concluding the matter.

14 6. In light of the foregoing facts and the pending resolution of the dispute, the parties
15 believe that it is unnecessary for the Court to hold the Case Management Conference, which they
16 believe will ultimately become moot.

17 7. Accordingly, the parties have agreed that a continuance of the Case Management
18 Conference in this action to July 17, 2015 is appropriate.

19 8. There have not been any previous time modifications in this case, either by stipulation
20 or Court order.

21 9. If granted, this time modification is not expected to have any effect on the greater
22 schedule for this case.

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1 10. Accordingly, Biogen hereby respectfully requests that the Case Management
2 Conference be rescheduled to July 17, 2015, or as soon thereafter as is convenient for the Court.

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4 Dated: May 18, 2015

HARVEY SISKIND LLP
LAWRENCE J. SISKIND
JANE A. LEVICH

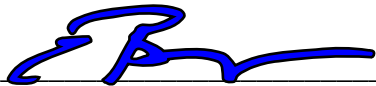
ECKERT SEAMANS CHERIN & MELLOTT, LLC
ROBERTA JACOBS-MEADWAY
JOSHUA L. KIRSCH

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9 By: /s/
10 Jane A. Levich

11 Attorneys for Plaintiff
12 BIOGEN IDEC MA INC.

13 **IT IS SO ORDERED.**

14 Dated: May 21, 2015

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The Honorable Charles R. Breyer
United States District Judge

PROOF OF SERVICE

The undersigned declares: I am a resident of the United States and am employed in the City and County of San Francisco, State of California; I am over the age of eighteen years and not a party to the within action; my business address is Four Embarcadero Center, 39th Floor, San Francisco, CA 94111.

On the date stated below, I served the following documents:

- **STIPULATED MOTION FOR CONTINUANCE AND [PROPOSED] ORDER**

by placing a true copy thereof enclosed in a sealed envelope and served in the manner described below to the interested parties herein and addressed to:

Neurobiogen, LLC
NASA Research Center
Moffett Building 19-1076
P.O. Box 151
Moffett Field, CA 94035

Lloyd Tran
5910 Allen Ave.
San Jose, CA 95123

Lloyd Tran
1159 Sonora Court, Suite 345
Sunnyvale, CA 94086

Neurobiogen, LLC
1159 Sonora Court, Suite 345
Sunnyvale, CA 94086

 X **MAIL:** I caused such envelope(s) to be deposited in the mail at my business address, with postage thereon fully prepaid, addressed to the addressee(s) designated. I am readily familiar with the business practice of collecting and processing correspondence to be deposited with the United States Postal Service on that same day in the ordinary course of business.

 X **(FEDERAL):** I declare that I am employed by the office of a member of the bar of this court at whose direction the service was made.

Executed on May 20, 2015 at San Francisco, California.

Sharan Devoto